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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 MYRA BOLECHE MINKS, AND
JESSICA TANG,
15 Defendants.
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CASE NO. 2:22-CR-00137-JAM

**STIPULATION REGARDING
EXCLUDABLE TIME PERIODS UNDER
SPEEDY TRIAL ACT; ORDER**

DATE: April 11, 2023

TIME: 9:00 a.m.

COURT: Hon. John A. Mendez

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18 **STIPULATION**

19 1. By previous order, this matter was set for status on April 11, 2023.

20 2. By this stipulation, the defendants now move to continue the status
21 conference until **June 13, 2023, at 09:00 a.m.**, and to exclude time between April 11,
22 2023, and June 13, 2023, under Local Codes T2 and T4.

23 3. The parties agree and stipulate, and request that the Court find the
24 following:

25 a) The government has represented that the discovery associated with
26 this case includes approximately 3,800 pages of reports, video and audio recordings,
27 and photographs. In addition, digital device extractions have been produced in
28 discovery and amount to approximately 10 TB of data. All of this discovery has

1 been produced directly to counsel.

2 b) Counsel for the defendants desire additional time to review the
3 discovery, counsel with their clients, conduct investigation and research related to
4 the criminal charges, and otherwise prepare for trial.

5 c) Counsel for the defendants believe that failure to grant the above-
6 requested continuance would deny them the reasonable time necessary for effective
7 preparation, taking into account the exercise of due diligence.

8 d) The government does not object to the continuance.

9 e) Based on the above-stated findings, the ends of justice served by
10 continuing the case as requested outweigh the interest of the public and the
11 defendant in a trial within the original date prescribed by the Speedy Trial Act.

12 f) For the purpose of computing time under the Speedy Trial Act, 18
13 U.S.C. § 3161, et seq., within which trial must commence, the time period of April
14 11, 2023 to June 13, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. §
15 3161(h)(7)(A), B(ii), (iv) [Local Code T2 and T4] because this is a complex case and it
16 results from a continuance granted by the Court at defendant's request on the basis
17 of the Court's finding that the ends of justice served by taking such action outweigh
18 the best interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: April 3, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ JUSTIN L. LEE
JUSTIN L. LEE
Assistant United States Attorney

Dated: April 3, 2023

/s/ GAIL SHIFMAN
GAIL SHIFMAN
Counsel for Defendant
Myra Minks

Dated: April 3, 2023

/s/ THOMAS A. JOHNSON
THOMAS A. JOHNSON
Counsel for Defendant
Jessica Tang

ORDER

IT IS SO FOUND AND ORDERED.

Dated: April 03, 2023

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE